

**Title:** Vendor Credentialing and Conduct Policy (#239)  
**Scope:** Network  
**Manual:** Administrative  
**Origination Date:** 06/12/2013  
**Revision Dates:** 8/1/2017  
**Review Dates:** 1/18/2016; 7/1/2016

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**I. Purpose:**

1. To protect the privacy and safety of patients, physicians and staff.
2. To minimize interruption of patient care and staff productivity.
3. To provide guidelines for vendors as well as St. Luke's University Health Network (SLUHN) staff and physicians who conduct business on behalf of SLUHN, with ethical standards intended to protect patient and financial confidentiality.
4. To require vendors conducting business with SLUHN subsidiaries to complete a certification process and act in accordance with established policies.

**II. Scope:**

1. Applies to any vendor that has a business relationship with SLUHN including but not limited to vendors providing medical devices, supplies, pharmaceuticals, purchased services, equipment, as well as vendors involved in patient care procedures where their presence may be requested in an advisory/training capacity.
2. Applies to vendors providing service on equipment or within any physical facility of SLUHN.

**III. Definitions:**

1. Vendors are defined as companies and their representatives of a distributor, manufacturer, service provider, home health agency, nursing home or any other company who visits a SLUHN facility for the purpose of providing patient care and treatment, goods or services, soliciting, marketing or distributing information regarding

- the use of medical devices, supplies, pharmaceuticals, equipment, product education and other purchased services.
2. Pharmacy policies are inclusive of drug use guidelines, formularies and utilization management initiatives approved by SLUHN.
  3. Vendor Certification is the process to qualify a vendor who wants to call on a SLUHN entity. The certification and educational process will include but not be limited to SLUHN policies and procedures; privacy regulations; conflict of interest; HIPAA requirements; credentialing and licensure requirements, if applicable; immunization/health screenings; drug screening to include screening for the following prohibited drugs: cocaine, amphetamines, barbiturates, benzodiazepines, marijuana, opiates, phencyclidine, propoxyphene, and methadone; criminal background and child abuse history clearance; federal and state database checks for excluded parties.
  4. Service is defined as purchased services or repair service to facilities or equipment.
  5. Goods are defined as any supply, equipment or any other item, whether medical or otherwise, purchased by or under consideration for purchase by any SLUHN entity.
  6. Contract personnel are defined as individuals that are not employed by SLUHN who provide care, services or treatment at SLUHN pursuant to a written agreement.

#### **IV. Requirements**

1. Vendors are not permitted to provide care, treatment, goods or services at SLUHN unless they meet the applicable screening requirements for vendor credentialing as implemented by Vendormate and as otherwise set forth in the underlying purchase or services agreement with the vendor (hereinafter referred to as Personnel Requirements). The specific Personnel Requirements that must be met by each vendor will vary depending on the level of contact with patients, patient care areas and/or patient information.
2. Vendors that interact with SLUHN are required to comply with all applicable health/drug screening requirements; criminal and child abuse background checks, results of which are acceptable to SLUHN; credentialing and licensure requirements; competency requirements; research integrity; HIPAA; pharmacy policies; Code of Conduct requirements and follow the practice procedure requirements of this policy.

3. Vendors must register with Vendormate online registration and credentialing system and complete the certification process before visiting SLUHN entities.
4. Vendors will be required to electronically acknowledge a statement confirming they have reviewed and agree to comply with SLUHN policies.
5. Network Materials Management Department will monitor Vendor Compliance on a monthly basis. Notifications of non-compliance will be e-mailed to Vendors. Vendors will be given 10 business days to become compliant. If compliance is not achieved in 10 business days, the vendor will not be allowed to come on-site at any SLUHN facility until fully compliant.
6. Violators of this policy will be subject to disciplinary action as described in Section XVI Compliance and Disciplinary Action.

#### **V. Registration and Certification for Vendors**

1. Vendors are granted access to SLUHN facilities as a privilege and not a right.
2. Vendors are required to successfully complete the Vendor Certification process **prior to scheduling any appointments**. A vendor requesting on-site access will register and begin the credentialing process by logging on to <https://sluhn.vendormate.com>.
3. Each Vendor must provide a letter of competency from their employer stating the vendor representative is qualified to act in an advisory capacity utilizing the described company equipment/device/product/service and/or the ability to train others in the use of their product.
4. The vendor will provide documentation of immunizations within the last 6 months, which complies with SLUHN standards. This applies to vendors that will be providing services on-site.
5. The vendor will be required to electronically acknowledge a statement confirming they have reviewed all applicable SLUHN policies and agree to comply with those policies.
6. The vendor must pay a non-refundable annual fee to Vendormate to cover the cost of providing education, certification and associated ongoing compliance monitoring.

7. Once the certification process has been successfully completed, a photo identification badge can be printed on-site at the designated check in point, provided the vendor has a scheduled appointment.
8. Tailgating is prohibited and is defined as one vendor officially registering, accompanied by another vendor who has not registered.
9. Vendors will have online access to all applicable Materials Management and other applicable SLUHN policies through Vendormate.

## **VI. Appointments**

1. Vendors are not permitted to call on any SLUHN facility without an appointment in the Vendormate system, set by a SLUHN staff member. Staff and physicians are under no obligation to grant appointment requests.
2. Request for appointments must be made by calling or e- mailing prior to the requested day. Products to be discussed or services to be performed must be identified at the time the appointment is scheduled.
3. Should unanticipated patient care requirements or other circumstances arise, the appointment may need to be rescheduled. The vendor will respect the decision to cancel and reschedule at another time. If the appointment is cancelled, the vendor must immediately leave the premises.

## **VII. Vendor Identification Badges**

1. Vendors are required to stop at the designated kiosk at the respective SLUHN facility to sign in and print a SLUHN picture identification badge.
2. Kiosks are located in the lobby during business hours. For after hour visits vendors are required to sign in at the Emergency Department. Business hours are found by logging on to <https://sluhn.vendormate.com>.
3. Badges must be worn on the upper torso and be visible at all times.
4. Vendors will be required to sign out at the kiosk. Failure to check in or out may subject the vendor to disciplinary action as described in Section XVI Compliance and Disciplinary Action.

5. Vendors that do not enter the building are not required to check in or wear a badge, i.e. Lawn Care Vendors.
6. Vendors may bring associates with them with valid appointment. Associates visiting patient care areas are required to provide documentation per the Observer Proof of required Immunity letter. An Observer/Vendor memorandum of Understanding available is online in Vendormate.
7. Vendors are only allowed one temporary badge while they are working on credentialing. After the first visit, if still not registered and credentialed, access to SLUHN facilities will be denied.
8. SLUHN reserves the right to limit the number of visits made by any particular vendor, the number of people visiting and duration of any visit.
9. Vendors who call on Visiting Nurse Association, HomeStar, St. Luke's Physician Group offices and other Hospital owned and licensed Ambulatory Sites are not required to check in at a kiosk and receive an Identification Badge. However, these vendors are still required to register and provide credentials through Vendormate and appointments are still required prior to coming on-site.

#### **VIII. New Products**

1. Vendors who want to introduce a Product to the Network must present it to a Purchasing Service Line Manager in Network Materials Management prior to discussing with the department or physician. The Service Line Manager will review the Product with the department or physician. If the Product merits further investigation, it will be referred to a Work Team for review and possible addition to the agenda.

#### **IX. Confidentiality**

1. Vendors are not permitted to solicit individual or collective patient information or procedure volumes, or any other information regarding procedure or patient statistics from Staff.

2. Vendors are not permitted to solicit any financial information including cost of supplies and equipment, competitors pricing, or procedure costs from Staff or physicians.
3. Vendors shall not attend programs in which specific patients are discussed or when quality assurance or risk management issues are presented without explicit prior permission from the applicable Department Manager.
4. Violation of this policy will result in disciplinary action as described in Section XVI Compliance and Disciplinary Action.
5. No contracts, pricing agreements, memoranda of understanding, or other written documents provided by a vendor may be given to or signed by Staff.

**X. Patient Care Areas**

1. Vendors are prohibited from entering patient care areas, including but not limited to, the Emergency Department, Operating Room, Cardiac Interventional Areas, other interventional areas, patient care units, outpatient clinics, clinic staff rooms and any staff or physician lounges without explicit permission.
2. The following are the only circumstances under which a vendor may enter a patient care area: (1) the vendor is required for training on new equipment or goods already purchased by SLUHN (2) the vendor is required in the Operating Room and other clinical areas in order to advise physicians or as necessary to develop competency with the goods or equipment. These instances should be pre-approved by the Department Manager.
3. Vendors will comply with respective facility policies regarding scrub use and laundering of scrubs.

**XI. Pharmaceutical Vendors**

1. Vendors are required to make appointments through the Network Pharmacy department by calling 484-526- 4211.
2. The Network Director of Pharmacy must approve any educational sessions, lunches, or any other demonstrations of pharmaceutical products.
3. The Network Director of Pharmacy reserves the right to deny any promotion of pharmaceutical products of non-formulary items.
4. Promotion of drugs against established drug formularies are

strictly prohibited. Vendors who discuss such agents will be suspended from visiting SLUHN entities pending review of the event.

5. Preprinted prescription pads from vendors are not permitted at any SLUHN facility.

## **XII. Displays**

1. Other than specifically allowed for in this section, vendors are not permitted to display products or product information within any SLUHN facility.
2. Vendors cannot place information in mailboxes of staff or post materials on bulletin boards within any SLUHN facility without explicit permission from the Department Manager.
3. Displays may be allowed adjacent to meeting rooms in conjunction with approved CME courses, approved research symposia or other education activities provided that the course director or Department Manager has approved the use of commercial displays.
4. Vendor must not engage in any sales activity within the area that the education is occurring.
5. Displays must be consistent with policies endorsed by the Accreditation Council for CME Standards for Commercial Support.
6. Pharmaceutical displays must be approved by the Network Director of Pharmacy and must be consistent with the approved drug formulary.
7. Displays may be allowed in staff lounges for training if approved by the Department Manager for educational purposes only and must be consistent with products already in use at SLUHN.

## **XIII. Promotional Activities**

1. Cash, gifts, items of value, or other incentive programs are strictly prohibited at any SLUHN facility and may not be given to Staff.
2. Breakfast, lunch, dinner or snacks may be provided only during an educational session and only given to staff receiving the education; the cost of the food items must be reasonable.
3. Vendors are not permitted to distribute, post, or leave any type

of unsolicited printed or handwritten material, advertisements, signs or invitations at any SLUHN facility without permission.

4. Vendor-sponsored raffles, lotteries or contests, which result in gifts to the winner, are forbidden.

#### **XIV. Gifts/Grants**

1. Gifts of cash or its equivalent are prohibited. This includes gift certificates, stocks, coupons, and gift cards. Discount on personal purchases of a vendor's product is prohibited if the discount is, or could be interpreted as, being offered because of the SLUHN's business relationship.
2. Non- monetary gifts (e.g. flowers and gift baskets) exceeding \$100 per calendar year are prohibited.
3. Textbooks and items of educational value may be provided to an SLUHN entity if pre-approved by the applicable Department Manager and consistent with Standards of Conduct policy. Education materials must be balanced in presentations and must not directly market a product or company; however, the educational material may have the creator's name and company on it.
4. SLUHN is governed by the standards of Commercial Support of the Accreditation Council for CME addresses institutional responsibility, handling of funds and reasonableness of payments, disclosure and other issues.  
Unrestricted educational grants should go through the Development Office or Hospital Foundation.

#### **XV. Donations and Sponsorships**

1. A vendor's donation or sponsorship does not guarantee future invitations to bid their products or services or acceptance of future bids and will not be considered as part of the price or contract negotiations.
2. Vendors interested in making a donation to SLUHN shall contact the Development Office or Hospital Foundation.

#### **XVI. Compliance and Disciplinary Action**

1. Vendors who violate any of the SLUHN policies may be subject to loss of visitation privileges at all SLUHN entities. There will be no refunds of fees associated with vendor credentialing.



2. Vendors without proper identification badges will be escorted or directed to the check in at the designated check-in kiosk. If they need to register the kiosk will have information regarding Vendor Certification.
3. Uncooperative vendors, or those in violation of policies, may be escorted off premises.
4. The Compliance Officer and Materials Management will investigate any reported violations of this policy. If the vendor is found in violation of any policy, the ability to visit any SLUHN facility may be suspended for a minimum of one month. Repeated and flagrant violations can result in indefinite suspension of privileges for the individual and, if necessary, the vendor's company.
5. The Compliance Officer and Director of Materials Management will report all vendor disciplinary action to the applicable Department Manager.
6. If a vendor does not adhere to any of the policies stated herein, the vendor and vendor's manager will be required to participate in a meeting with Materials Management. Depending on the violation of policy, a vendor may be required to complete an educational compliance program and suspension of visitation privileges.

## **XVII. Smoke-Free Environment**

1. St. Luke's University Health Network is committed to the promotion of health, which includes the prevention of disease as well as its treatment.
  - Smoking by employees and vendors is not permitted in or on any of the premises or grounds of any Network owned or leased facilities.
  - Smoking on adjacent properties and sidewalks creates a negative reflection on the image of St. Luke's and is also prohibited.

## **XVIII. References**

1. Please refer to the following additional SLUHN policies:
  - Network Value Analysis Policy (APPM)
  - Conflict of Interest Policy (Compliance Policy)

**JC: EC.02.02.01**

**XIX. Attachments**

- Observation/Vendor Memorandum of Understanding
- Background Screening Policy
- Information Technology (IT) Access
- Compliance With Law
- Code of Conduct

**XX. Policy Responsibility**

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| SLA-SLB-SLM-<br>SLMC-SLQ-SLRA-<br>SLW<br>SLWEEC- <b>SLAASC</b> | Director, Network Materials<br>Management | Lead preparer |
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**XXI. Disclaimer Statement**

This policy and procedure is intended to provide a description of a course of action to comply with legal requirements and/or operational standards. There may be specific circumstances not contemplated by this policy and procedure that may make compliance either unclear or inappropriate. For advice in these circumstances, consult with your Chain of Command, Administrator on Call, Clinical Risk Management, Legal Services, Accreditation and Standards, or Compliance Officer, as appropriate.

**XXII. Approval**

Director, Network Materials Management